

UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF PENNSYLVANIA

CEMENT MASONS' UNION LOCAL NO.	:	CIVIL ACTION
592 PENSION FUND, et al.	:	
Plaintiffs	:	
v.	:	
BRIDGES CONTRACTING, INC.	:	
Defendant	:	NO. 02-cv-2837

DECLARATION OF MARC L. GELMAN, ESQUIRE

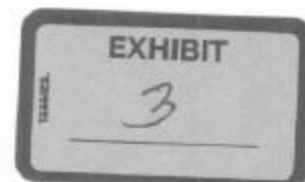
Marc L. Gelman, Esquire states, under penalty of perjury that the following is true and correct.

1. I am employed as an associate with the Law Firm of Jennings Sigmond, P.C.
2. Attached to this Motion as Exhibit 4 is a computerized billing list showing all work performed by the office of Jennings Sigmond, P.C. and related costs in connection with the collection of the contributions at issue in this action through July 22, 2002. The computerized listing is prepared from contemporaneous attorney time and expense records, the originals of which are maintained in the regular business records and files of Jennings Sigmond, P.C.. The identity of those performing services connected with this matter are:

<u>Initials</u>	<u>Name</u>	<u>Title</u>
MLG	Marc L. Gelman	Attorney

3. Based upon my review of Exhibit 4, the Funds have incurred attorney's fees and costs of \$1,528.68.

4. I have executed this Declaration in support of the Motion of Plaintiffs for Default Judgment against Bridges Contracting, Inc., ("Company" or "Bridges"), and request this Court to



consider the same as proof in support of the allegations contained in the Complaint of the Funds and other facts stated in this Declaration.

Pursuant to 28 U.S.C. §1746, I declare under penalty of perjury that the foregoing is true and correct.

Executed on: 7/23/02



MARC L. GELMAN, ESQUIRE

IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF PENNSYLVANIA

CEMENT MASONS' UNION LOCAL NO. 592
PENSION FUND, et al.

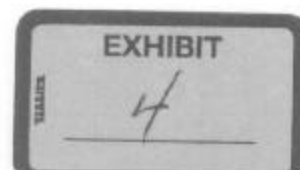
v.

BRIDGES CONTRACTING, INC.

CIVIL ACTION NO. 02-CV-2837

JENNINGS SIGMOND, P.C. ATTORNEYS' FEES – JULY 2002

<u>Date</u>	<u>Attorney</u>	<u>Task</u>	<u>Time</u>
7/1/02	MLG	Preparation of Judgment and Order	.8
7/2/02	MLG	Review and Revision of Order and Judgment Calculation of Amounts Owed	.8
7/16/02	MLG	Preparation of Motion for Default Judgment Preparation of DiSabato Declaration Preparation of Memorandum of Law in Support of Motion for Default Judgment Review Interest Calculations	1.7
7/19/02	MLG	Review and revise Memorandum of Law Phone Conference with A. DiSabato regarding the Collective Bargaining Agreement Calculation of Attorneys' Fees and Costs	.7
Total	MLG	4 Hrs. x \$185.00 per hr. =	\$ 740.00
		Through and Including June 2002 =	<u>\$ 788.68</u>
		Grand Total	\$1,528.68



REPRINT OF BILLED DETAILS (as billed)

Bill number CM592F-23423-001 SGR
 Bill date 05/08/02

Cement Masons Local Union No. 592
 Health, Welfare and Pension Funds
 c/o Anthony DiSabato, Jr.
 2501 Snyder Avenue
 Philadelphia, PA 19145

Bridges Contracting, Inc. (23423)

FOR PROFESSIONAL SERVICES RENDERED

04/26/02 MLG	Phone Conference with A. DiSabato regarding Institution of Litigation	.30 hrs 185 /hr	55.50
04/29/02 MLG	Phone Conference with Fund regarding Delinquency Information Review of Documents from Fund regarding same Preparation of Memo to Attorney S. Rosenthal regarding Opening Case File	.50 hrs 185 /hr	92.50
TOTAL FEES			\$ 148.00

DISBURSEMENTS

TOTAL DISBURSEMENTS	\$.00
---------------------	--------

BILLING SUMMARY

TOTAL FEES	\$ 148.00
TOTAL CHARGES FOR THIS BILL	\$ 148.00

REPRINT OF BILLED DETAILS (as billed)

Bill number CM592F-23423-002 SGR
 Bill date 06/10/02

Cement Masons Local Union No. 592
 Health, Welfare and Pension Funds
 c/o Anthony DiSabato, Jr.
 2501 Snyder Avenue
 Philadelphia, PA 19145

Bridges Contracting, Inc. (23423)

FOR PROFESSIONAL SERVICES RENDERED

05/06/02 MLG	Office Conference with C. Morton regarding Corporate Search	.20 hrs 185 /hr	37.00
05/09/02 MLG	Review of Results of Corporate Information Search Preparation of Complaint	1.50 hrs 185 /hr	277.50
TOTAL FEES			\$ 314.50

DISBURSEMENTS

05/31/02 SP	Service of Process	45.00
05/31/02 COPY	Photocopies	.91
TOTAL DISBURSEMENTS		\$ 45.91

BILLING SUMMARY

TOTAL FEES	\$ 314.50
TOTAL DISBURSEMENTS	\$ 45.91
TOTAL CHARGES FOR THIS BILL	\$ 360.41

REPRINT OF BILLED DETAILS (as billed)
CM592F-23423-ALL SGR

Page 1

REPORT TOTALS

TOTAL FEES 462.50

TOTAL DISBURSEMENTS 45.91

508.41

Sagot, Jennings & Sigmond

REPORT DATE 07/02/02
 REPORT NUMBER JPD38-048007
 SORTED BY CLIENT/MATTER
 BILL THROUGH RANGE 00/00/00-07/02/02

WORK IN PROCESS REPORT

PAGE 1

PRINTED BY MHT

CLIENT CM592F MATTER 23423 Cement Masons Local 592 Funds Bridges Contracting, Inc.
 Health, Welfare and Pension Funds
 c/o Anthony DiSabato, Jr.
 2501 Snyder Avenue
 Philadelphia, PA 19145

BILL TIMEP : SGR Sanford G. Rosenthal
 ORIG TIMEP : TWJ Thomas W. Jennings

DATE	TIMEKEEPER	HOURS	AMOUNT	DESCRIPTION
06/18/02	MLG	.50	92.50	Phone Conference with A. DiSabato regarding Case Status
06/21/02	MLG	.20	37.00	Preparation of Request for Default Review and Revision of Request for Default

TIMEKEEPER TOTALS

MLG	.70	185 /hr	129.50
TOTAL	.70	\$	129.50

DISBURSEMENTS

06/01/02	FF	150.00	Filing Fee - US District Court
06/05/02	COPY	.77	Photocopies

DISBURSEMENT TOTALS

FF	150.00
COPY	.77
DISB TOTAL	\$ 150.77
BILL TOTAL	\$ 280.27

LAST ACTIVE 07/02/02

LAST PAYMENT 06/21/02

Sagot, Jennings & Signond

REPORT DATE 07/02/02

WORK IN PROCESS REPORT

PAGE 2

REPORT NUMBER JP018-048007

SCOTED BY CLIENT/MATTER

PRINTED BY MHT

BILL THROUGH RANGE 00/00/00-07/02/02

	HOURS	FEES/ EXPENSES
REPORT TOTALS	.70	129.50
		150.77